

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:)	
)	Case No. 20-40262-399
SCOTT A. HAGEMEIERS)	Chapter 13
)	
Debtor(s)/Movants(s),)	
)	Response Due: April 7, 2021
v.)	
)	
HOME POINT FINANCIAL CORPORATION)	
)	
Creditor(s)/Respondent(s).)	

To: Home Point Financial Corporation
Attn: Willie Newman, President & CEO
2211 Old Earhart Road, Suite 250
Ann Arbor, MI 48105

OBJECTION TO CLAIM 4

Debtor herein, objects to your Claim No. 4, in the amount of \$59,425.21, for the following reason(s):

Debtor filed a motion to sell the real estate that secures the debt owe to Home Point Financial Corporation and is the basis for Claim 4. Claim 4 will be paid in full directly to Home Point Financial Corporation at closing. No further funds should be paid to Home Point Financial Corporation from the debtor's plan payments.

WHEREFORE, Debtor prays for an order granting debtor's objection to claim 4, denying claim 4 and for such other relief that the Court deems just and proper.

THIS OBJECTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE OBJECTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE OBJECTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE OBJECTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND

THE HEARING, THE DATE OF WHICH WILL BE SENT TO YOU IF YOU FILE A RESPONSE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE OBJECTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

DATED: 03/17/2021

Respectfully submitted,
WESTBROOK LAW GROUP, LLC

/s/ Brent S. Westbrook

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ATTORNEY FOR DEBTOR

CERTIFICATION OF SERVICE

I. I certify that a true and correct copy of the foregoing document was filed electronically on March 17, 2021 with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF system as listed on the court's electronic mail notice list.

II. I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by regular United States mail service, first class, postage fully pre-paid, addressed to the parties listed below on March 17, 2021:

Home Point Financial Corp
11511 Luna Rd.
Farmers Branch, TX 75234

III. I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served on the following Insured Depository Institution pursuant to Fed. R. Bankr. P. 7004(h), or on the United States, or any of its officers or agencies pursuant to Fed. R. Bank. P. 7004(b)(4)

or (5), on March 17, 2021 by Certified Mail addressed to the following persons:

Home Point Financial Corporation
Attn: Willie Newman, President & CEO
2211 Old Earhart Road, Suite 250
Ann Arbor, MI 48105

/s/ Brent S. Westbrook

Brent S. Westbrook